

Andrew W. Muir, Esq.
Muir Law Offices
560 Van Reed Road, Suite 307
Wyomissing, PA 19610
attorneymuir@outlook.com

*Attorney for Defendant C/T
Install America, LLC*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

VIRGINIA COLE, *on behalf of herself and
others similarly situated,*

Plaintiff,

vs.

C/T INSTALL AMERICA, LLC

Defendant.

Case No.: 5:25-cv-03531-CH

Hon. Catherine Henry, U.S.D.J.

**DECLARATION OF ANDREW W. MUIR IN SUPPORT OF C/T INSTALL AMERICA,
LLC'S MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM**

I, Andrew W. Muir, pursuant to 28 U.S.C. §1746, declare as follows:

1. I am an attorney with Muir Law Offices, counsel for Defendant C/T Install America, LLC ("Install America") in the above-captioned matter/
2. I am duly admitted to practice law before the United States District Court for the Eastern District of Pennsylvania. I submit this Declaration in support of Install America's Motion to Dismiss for Failure to State a Claim filed on September 3, 2025.
3. I am over the age of 18 years old and am qualified to make this Declaration. The facts herein are true and correct to the best of my knowledge.

4. Attached as Exhibit A to this Declaration is a true and accurate copy of the Complaint filed in the matter *Virginia Cole et al. v. Affluent Ads LLC d/b/a Leadnomics and Rapid Response Marketing*, Case No. 2:24-cv-01173.

I hereby declare under penalty of perjury and the laws of the United States and Pennsylvania that the foregoing statements made by me are true and correct to the best of my knowledge, information, and belief

Dated: September 3, 2025

/s/ Andrew W. Muir

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